

Exhibit 86

Message

From: Richard Markowitz [Rmarkowitz@argremgt.com]
Sent: 3/13/2012 5:32:25 PM
To: Ben-Jacob, Michael [/O=KAYESCHOLER/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ben_m]
Subject: FW: Belgian equities - Domestic exemption for non-resident non-profits - Certificate

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----- Forwarded Message

From: Robert Neyt <robert.neyt@freshfields.com>
Date: Mon, 12 Mar 2012 17:07:19 +0100
To: <'Rmarkowitz@argremgt.com'>, <'JHVM@Argremgt.com'>, <'alarosa@argremgt.com'>, <'mstein@argremgt.com'>, <'jlhote@argremgt.com'>, Robert Klugman <rklugman@storcapital.com>
Cc: Jonathan Sander <JSander@duetgroup.net>, Aneil Anand <aanand@duetgroup.net>
Subject: Belgian equities - Domestic exemption for non-resident non-profits - Certificate

Dear Sirs,

Further to our call earlier today please find below the wording of a certificate with respect to the Belgian domestic withholding tax exemption as discussed.

I'm happy to discuss, should you have any further questions or comments.

Kind regards,

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BELGIAN DIVIDEND WITHHOLDING TAX EXEMPTION

CERTIFICATE

Application of article 106, §2 of the Royal Decree executing the Belgian Income Tax Code 1992 (RDITC)

Drafted in accordance with article 117, §2 of the RDITC concerning the dividends attributed or payable by:

[Dividend paying company], a [legal form], incorporated under the laws of the Kingdom of Belgium , with its registered office at [address], registered with the register of legal entities under number [number]

to

[Shareholder], a [legal form], incorporated under the laws of [resident state], with its registered office at [address], registered with the [registry] under the number [number].

[Shareholder] hereby certifies as beneficiary of the dividend that it is:

- a) the owner or usufruct holder of the shares on which the dividends are paid;
- b) a non-resident who is not conducting a business or lucrative activities and which is, in its country of residence, exempt from income tax; and
- c) not under a contractual obligation to pay over the dividend to an ultimate beneficiary, unless such ultimate beneficiary is a non-resident under article 106, §2 RDITC, an investment fund under article 106, §3 RDITC or a parent company under article 106, §5 or §6 RDITC.

[Place]

[Date]

[Signature]

[Capacity]

(152352:0005)

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